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By email

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The Members
Aviation Safety Regulation Review Panel

ASIC's and AVID's

The purpose of this submission is to put a case for the abolition of ASIC's and AVID's for general aviation pilots and replacement of them with a requirement that such pilots carry a permitted form of photo identification such as a drivers licence.

Background

ASIC's and AVID's were hurriedly introduced following the terrorist attacks on the World Trade Centre in the USA. Since then they have added no material benefit to aviation or general public security in this country.

Despite initially considering more stringent identification and a background check processes, neither the USA nor other countries affected by aviation terrorism to date have introduced such an ineffective, frequently renewable, process driven and costly requirement. Pilots in the USA are required to carry only a form of photo identification which can include a current State issued driver's license, a passport or similar documents (see clause 61.3 of the Electronic Code of Federal Regulations in the attached link - <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=40760189a03dfea0b501608f33820a45&rgn=div5&view=text&node=14:2.0.1.1.2&idno=14#14:2.0.1.1.2.1.1.3>).

Checking ASIC's and AVID's

There is little point in issuing expensive and up-to-date identification documents (and requiring them to be visible at all times) if they are not frequently checked. I have had an ASIC since they were introduced and I have never been checked. The closest I have come to having my ASIC examined by security personnel was a perfunctory glance by a security officer at Coffs Harbour airport, who seemed satisfied, at a distance at which he could not have read whether the red card hanging around my neck was either genuine or up-to-date.

Security at RPT airports

The physical security arrangements at many RPT airports end at either side of the terminal building and the RPT apron. In most cases, they then constitute nothing more than a 4-wire livestock fence (usually in different states of disrepair). This, combined with the fact that most regional RPT airports do not have security personnel (or if they do, they do not perform security checks) renders ASIC's and AVID's pointless. Having this type of airport "security" at airports is the equivalent of putting a very expensive triple locked-door on a tent and leaving it open all year round.



The final failure of this system is that it gives members of the aviation community and the public a false sense of security.

Renewal

The renewal process for an ASIC effectively requires the holder to re-establish his or her identity each time a new card is applied for (currently every 2 years). Ironically, the documents permitted to support the establishment of identity can be significantly older than that and, in some cases, have no expiry date. For example, one of the key documents accepted is a current passport. Australian passports have a currency period of 10 years. Yet this document can be used up to 5 times to "re-establish" a pilot's identity on renewal. Notwithstanding this, an applicant pilot is required to obtain a new passport photo and have it verified by an authorised person. Other documents that can be used as part of the process (such as a birth certificate or citizenship certificate) have no expiry date and can be re-used for every ASIC renewal.

Why do we have to re-establish our identity every 2 years when the documents we use to do this are up to 10 years old or older?

Criminal background check

The justification for a new criminal check every 2 years is apparently to ensure that in the preceding 2 years a pilot has not committed an "aviation related offence" which disqualifies that pilot from holding an ASIC. These offences are very limited in nature and generally constitute indictable offences for violence or other terrorist type activities. I do not have access to the statistics showing the number of pilots, if any, whose application or renewal of an ASIC has been refused on the basis of committing an "aviation related offence". In my view this should be checked and unless the number is statistically significant than it is self-evident the requirement cannot be justified.

Cost

The direct cost for an ASIC is \$186 and the direct cost of an AVID is \$152. Additional costs are obtaining passport quality photos and having them certified by an approved person. The cost in time and money is significantly more than the direct cost. Despite the assumption common to many, the vast majority of general aviation pilots are not the indulgent rich who have an exotic and expensive hobby. While flying is expensive, most general aviation pilots are ordinary salaried (or retired) individuals who often save enough money to be able to fly (usually) a club owned aircraft which is over 20 years old. The additional cost of an ASIC or AVID simply extends the time between flights for many. This may be bearable if the ASIC or AVID was an effective security tool. It is simply galling when it is patently not.

Flight Planning

Pilots are told that you do not need an ASIC if you avoid RPT airports. In many cases, it is impossible to flight plan for a cross country trip between two non-RPT airports and discharge your statutory obligations as a pilot for alternative airports (for emergency use) without making an alternative an RPT airport. Pilots should not be encouraged to avoid RPT airports as alternatives because they do not possess an ASIC.

Conclusion

1. ASIC's and AVID's are flawed and the case for them has never been properly established and does not now exist.
2. Even if they were justified, they are ineffective in the absence of greater physical security at airports (particularly regional RPT airports) with more security personnel.
3. The renewal process is unnecessarily complex and costly.
4. It is likely the required criminal background checks have not disqualified any applicant or, if they have, the number is not statistically significant.
5. The concession to GA pilots (the AVID) is only marginally less expensive and does not allow a GA pilot to even use a regional RPT airport as an alternative airport.
6. No other developed country has adopted such a process driven, frequently renewable and costly process (including those countries which have suffered from aviation borne terrorism).

ASIC's and AVID's should be abolished and replaced by the requirement to carry a permitted form of photo identification (such as a driver's licence, passport or identification card issued by certain State government departments) when exercising the privileges of a flying licence.

Yours sincerely

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